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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In	the	Matter	of
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Estate of David C. Henny

Transferor

WC Docket No.

and

David Christian Henny Testamentary Trust Marion F. Henny

Transferees,

For Transfers of Control of Whidbey Telephone Company and its Wholly-Owned Subsidiary Western Long Distance Inc., and of the affiliated Hat Island Telephone Company, all of which Provide Interstate Exchange Access and/or Interexchange Services in the State of Washington Pursuant to Domestic Blanket Authorizations under Section 214 of the Communications Act

TO: Chief, Wireline Competition Bureau

APPLICATION FOR STREAMLINED TRANSFERS OF CONTROL OF DOMESTIC BLANKET SECTION 214 AUTHORIZATIONS

The Estate of David C. Henny ("Henny Estate"; FRN: 0017180134), the David Christian Henny Testamentary Trust ("Henny Trust"; FRN: 0018730903) and Marion F. Henny ("Mrs. Henny"; FRN: 0017180142) hereby request Commission authorization for the transfers of control: (1) of the blanket domestic Section 214 authorizations for interstate exchange access services and interstate interexchange services held by Whidbey Telephone Company ("Whidbey"; FRN: 0004321451) and its subsidiary Western Long Distance, Inc. ("Western"; FRN: 0006992655) from the Henny Estate to the Henny Trust and Mrs. Henny; and (2) of the blanket domestic Section 214

authorization for interstate exchange access services held by Hat Island Telephone Company ("Hat Island"; FRN: 0004321444) from the Henny Estate to the Henny Trust.

Whidbey is an incumbent local exchange carrier ("ILEC") which provides local exchange telephone and exchange access services in two exchanges (the South Whidbey exchange on Whidbey Island, Washington, and the Point Roberts exchange at Point Roberts, Washington). Hat Island is an affiliated ILEC which provides local exchange telephone and exchange access services in a single exchange on Gedney (Hat) Island, Washington. Western is a wholly-owned subsidiary of Whidbey which provides domestic interstate and intrastate long distance toll services to customers in and around the Whidbey and Hat Island exchanges.

The Henny Estate currently owns: (a) all of the issued and outstanding capital stock of Whidbey (96,000 voting common shares and 864,000 non-voting common shares); and (b) all of the issued and outstanding capital stock of Hat Island (400 voting common shares). Mrs. Henny, the widow of David C. Henny, controls the Henny Estate in her capacity as the sole personal representative thereof.

Control of Whidbey will be transferred in two steps which will take place consecutively on the same day. In the first step, the Henny Estate will distribute all of the stock of Whidbey as follows: (a) 51.00 percent (48,960 voting shares and 440,640 non-voting shares) to Mrs. Henny; and (b) 49.00 percent (47,040 voting shares and 423,360 non-voting shares) to the Henny Trust (the trustees of which are Mrs. Henny, her son George T. F. Henny and her daughter Julia H. DeMartini, and the sole current life beneficiary of which is Mrs. Henny). In the second step, Mrs. Henny will transfer: (a) 1.00 percent of the stock of Whidbey (960 voting shares and 8,640 non-voting shares) to

her son George T. F. Henny; and (b) 1.00 percent of the stock of Whidbey (960 voting shares and 8,640 non-voting shares) to her daughter Julia H. DeMartini. At the completion of the transactions, the stock of Whidbey will be owned: (a) 49.00 percent by Mrs. Henny; (b) 49.00 percent by the Henny Trust; and (c) 1.00 percent each by George T. F. Henny and Julia H. DeMartini.

Control of Hat Island will be transferred in a single step whereby the Henny Estate will distribute all of the stock of Hat Island to the Henny Trust (the trustees of which are Mrs. Henny, George T. F. Henny and Julia H. DeMartini, and the sole current life beneficiary of which is Mrs. Henny).

Because Whidbey and Hat Island will be controlled entirely by members of the Henny family both before and after the proposed transactions, and because of the prominent roles of Mrs. Henny as sole personal representative of the Henny Estate before the transactions, as a trustee and the sole current life beneficiary of the Henny Trust, and as the owner of 49.00 percent of the stock of Whidbey after the transactions, it is possible that the proposed transactions constitute *pro forma* transactions involving no actual transfers of control of Whidbey and Hat Island and that no Section 214 application is required. However, due to the momentary holding and relinquishment by Mrs. Henny of a 51.00 percent interest representing *de jure* control of Whidbey between the first and second steps of the Whidbey transaction, this application is being filed out of an abundance of caution.

In accordance with the requirements of Section 63.04(a) of the Commission's Rules, the applicants submit the following information:

(1) Name, address and telephone number of each applicant:

Transferor:

Estate of David C. Henny c/o Mrs. Marion F. Henny, Personal Representative 14888 SR 525 Langley, WA 98260

Telephone: (360) 321-1111 Facsimile: (360) 321-8118

Transferees:

Marion F. Henny 14888 SR 525 Langley, WA 98260

Telephone: (360) 321-1111 Facsimile: (360) 321-8118

David Christian Henny Testamentary Trust c/o Marion F. Henny, Co-Trustee 14888 SR 525 Langley, WA 98260

Telephone: (360) 321-1111 Facsimile: (360) 321-8118

(2) Government, state or territory under the laws of which each corporate or partnership applicant is organized:

The Henny Estate exists under the laws of the State of Washington.

Whidbey is a corporation organized under the laws of the State of Washington.

Hat Island is a corporation organized under the laws of the State of Washington.

Western is a corporation organized under the laws of the State of Washington.

The Henny Trust is a trust organized under the laws of the State of Washington.

(3) Name, title, post office address, and telephone number of the officer or contact person to whom correspondence concerning the application is to be addressed:

For Transferor and Transferees:

Julia H. DeMartini, Chief Executive Officer Whidbey Telephone Company and Hat Island Telephone Company 14888 SR 525 Langley, WA 98260

Telephone: (360) 321-1111 Facsimile: (360) 321-8118

With a copy to counsel:
Gerard J. Duffy, Esquire
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street, N.W. (Suite 300)
Washington, D.C. 20037

Telephone: (202) 659-0830 Facsimile: (202) 828-5568

(4) Name, address, citizenship and principal business of any person or entity that directly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities:

WHIDBEY AND WESTERN PRIOR TO TRANSACTION:

The name, address, citizenship and principal business of the sole entity that presently owns ten percent (10.0%) or more of the equity and voting interests of Western are:

Name & Address	% Equity		
	& Voting	Citizenship	Principal Business
Whidbey Telephone Company	100.00%	WA	Telecommunications
14888 SR 525		Corp.	
Langley, WA 98260		-	

In turn, the name, address, citizenship and principal business of the sole entity that presently owns ten percent (10.0%) or more of the equity and voting interests of Whidbey are:

Name & Address	% Equity		
	& Voting	Citizenship	Principal Business
Estate of David C. Henny	100.00%	WA	Testamentary Estate
14888 SR 525		Estate	-
Langley, WA 98260			

The sole personal representative of the Henny Estate is Marion F. Henny, a United States citizen. Mrs. Henny is the widow of Mr. David C. Henny.

WHIDBEY AND WESTERN AFTER TRANSACTION:

The name, address, citizenship and principal business of the sole entity that will own ten percent (10.0%) or more of the equity and voting interests of Western after the proposed transactions are:

Name & Address	% Equity & Voting	Citizenship	Principal Business
Whidbey Telephone Company 14888 SR 525	100.00%	WA Corp	Telecommunications
Langley, WA 98260			

In turn, the names, addresses, citizenship and principal businesses of the persons and entities that will own ten percent (10.0%) or more of the equity and voting interests of Whidbey after the proposed transactions are:

Name & Address	% Equity & Voting	Citizenship	Principal Business
Marion F. Henny 14888 SR 525	49.00%	U.S.A.	Telecommunications
Langley, WA 98260			
David Christian Henny Testamentary Trust 14888 SR 525 Langley, WA 98260	49.00%	WA Trust	Investments, including Telecommunications

The trustees of the Henny Trust are Mrs. Henny, George T. F. Henny, and Julia H. DeMartini, all of whom are United States citizens. George T. F. Henny and Julia H. DeMartini (each of whom will own 1.00 percent of the stock of Whidbey after the proposed transaction) are two of the adult children of Mrs. Henny and the late David C. Henny. The sole current life beneficiary of the Henny Trust is Mrs. Henny.

HAT ISLAND PRIOR TO TRANSACTION:

The name, address, citizenship and principal business of the sole entity that presently owns ten percent (10.0%) or more of the equity and voting interests of Hat Island:

Name & Address	% Equity		
	& Voting	Citizenship	Principal Business
Estate of David C. Henny	100.00%	WA	Testamentary Estate
14888 SR 525		Estate	
Langley, WA 98260			

The sole personal representative of the Henny Estate is Marion F. Henny, a United States citizen. Mrs. Henny is the widow of Mr. David C. Henny.

HAT ISLAND AFTER TRANSACTION:

The names, addresses, citizenship and principal businesses of the sole entity that will own ten percent (10.0%) or more of the equity and voting interests of Hat Island after the proposed transactions are:

Name & Address	% Equity		
	& Voting	Citizenship	Principal Business
David Christian Henny	100.00%	WA	Investments, including
Testamentary Trust		Trust	Telecommunications
14888 SR 525			
Langley, WA 98260			

The trustees of the Henny Trust are Mrs. Henny, George T. F. Henny, and Julia H. DeMartini, all of whom are United States citizens. George T. F. Henny and Julia H. DeMartini are two of the adult children of Mrs. Henny and the late David C. Henny. The sole current life beneficiary of the Henny Trust is Mrs. Henny.

(5) Certification pursuant to 47 C.F.R. Sections 1.2001 through 1.2003 that no party to the application is subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

The Henny Estate, the Henny Trust and Mrs. Henny hereby certify, pursuant to 47 C.F.R. Sections 1.2001 through 1.2003 that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

(6) Description of the transaction:

The proposed transactions consist of the distribution of all of the Whidbey and Hat Island stock by the Henny Estate, which presently holds all of the stock of both entities.

Control of Whidbey will be transferred in two steps which will take place consecutively on the same day. In the first step, the Henny Estate will distribute all of the stock of Whidbey as follows: (a) 51.00 percent (48,960 voting shares and 440,640 non-voting shares) to Mrs. Henny; and (b) 49.00 percent (47,040 voting shares and 423,360 non-voting shares) to the Henny Trust (the trustees of which are Mrs. Henny, her son George T. F. Henny and her daughter Julia H. DeMartini, and the sole current life beneficiary of which is Mrs. Henny). In the second step, Mrs. Henny will transfer: (a) 1.00 percent of the stock of Whidbey (960 voting shares and 8,640 non-voting shares) to her son George T. F. Henny; and (b) 1.00 percent of the stock of Whidbey (960 voting shares and 8,640 non-voting shares) to her daughter Julia H. DeMartini. At the completion of the transactions, the stock of Whidbey will be owned: (a) 49.00 percent by Mrs. Henny; (b) 49.00 percent by the Henny Trust; and (c) 1.00 percent each by George T. F. Henny and Julia H. DeMartini.

Control of Hat Island will be transferred in a single step whereby the Henny Estate will distribute all of the stock of Hat Island to the Henny Trust (the trustees of which are Mrs. Henny, George T. F. Henny and Julia H. DeMartini, and the sole current life beneficiary of which is Mrs. Henny).

Whidbey and Hat Island will continue to exist as Washington corporations and to operate as ILECs providing interstate exchange access services in their current local exchange service areas. Western will continue to exist as a Washington corporation and to provide interstate and other interexchange services. Control of Whidbey by Mrs. Henny and the Henny Trust will result in these Henny Family entities having control of the domestic Section 214 authorizations held by Whidbey and Western. Control of Hat Island by the Henny Trust will result in this Henny Family entity having control of the domestic Section 214 authorization held by Hat Island.

(7) Description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:

Maps showing the telephone exchange service areas of Whidbey and Hat Island are attached as Exhibit A.

Areas and Telecommunications Services of Whidbey and its Affiliates

Whidbey is an ILEC that provides local exchange and exchange access services in two rural Washington exchanges (approximately 12,500 total access lines) -- the South Whidbey exchange on Whidbey Island and the Point Roberts exchange at Point Roberts. Whidbey's local exchange service offerings include voice mail and custom calling features such as call forwarding, call waiting, caller identification and three-way calling. Whidbey also offers other interstate domestic telecommunications services in and about the South Whidbey and Point Roberts exchanges, including operator services, marine radiotelephone services, mobile telephone and paging services, and directory assistance. Whidbey also provides other services, including Internet access and digital subscriber line ("DSL") services to customers within its exchange service areas and their vicinities.

Whidbey is the licensee of: (a) 700 MHz Lower Band Service Stations WQIZ641, WQIZ642, WQIZ643, WQIZ644, WQIZ645 and WQIZ646; (b) Paging and Radiotelephone Service Stations KNKM256 and KOP303; (c) Broadband Personal Communications Service Stations KNLG248 and KNLG517; (d) Common Carrier Point-to-Point Microwave Service Stations WGX509, WGX510, WLK849, WLK850, WLL520 and WPNC313; (e) Conventional Industrial/Business Pool Service Stations WPKS779 and WPQI277; (f) Marine Coast Service Station WHU300; (g) 700 MHz Lower Band Service Stations WPYU553, WPYU554 and WPYU555; and (h) 220 MHz Service (Non-nationwide) Stations WPCW390 and WPCW391.

Whidbey Telecom Internet and Broadband, a division of Whidbey, provides dial-up and high-speed Internet access services, including DSL services, to residential and business customers in portions of Island, Snohomish, and Whatcom Counties in the State of Washington.

American Alarm Systems, Inc., dba Whidbey Telecom Security and Alarms, a wholly-owned subsidiary of Whidbey, provides security products and services to residential and business customers in portions of Island, Snohomish, Skagit and Whatcom Counties in the State of Washington.

Western, a wholly-owned subsidiary of Whidbey (which does business as Whidbey Telecom Long Distance, Whidbey Long Distance, Point Roberts Long Distance and Hat Island Long Distance), provides intrastate, interstate and international long distance toll services to residential and business customers in and about Whidbey's South Whidbey and Point Roberts exchanges and Hat Island's Gedney (Hat) Island exchange.

FiberCloud, Inc. ("FiberCloud"), a wholly-owned subsidiary of Whidbey, provides data center services and Internet access services for business customers in facilities it operates in Seattle, Bellingham and Everett, Washington. FiberCloud also provides

Internet access services, including facilities-based services and broadband services, to a limited number of residential customers in Everett, Washington.

Whidbey also owns a non-controlling 0.87433 percent limited partner interest in the Seattle SMSA Limited Partnership which provides wireless telecommunications services in northwestern Washington State.

Hat Island is an ILEC that provides local exchange and exchange access services to residential and business customers (approximately 87 access lines) on Gedney (Hat) Island in Snohomish County, Washington. Hat Island's local exchange service offerings include voice mail and custom calling features such as call forwarding, call waiting, caller identification and three-way calling. Hat Island also provides DSL service to customers within its exchange service area and vicinity.

Whidbey and Hat Island have no other subsidiaries or affiliates that offer domestic telecommunications services.

(8) Statement as to how the application fits into one or more of the presumptive streamlined categories in Section 63.03 of the Commission's Rules or why it is otherwise appropriate for streamlined treatment:

Applicants believe that this application is appropriate for streamlined treatment pursuant to Sections 63.03(b)(1) and/or 63.03(b)(2) of the Commission's Rules.

Applicants believe this application is appropriate for treatment under Section 63.03(b)(1): (a) because the transferees the Whidbey stock (Mrs. Henny and the Henny Trust) and the Hat Island stock (Henny Trust) are not themselves telecommunications providers (although Mrs. Henny will be involved in the management of Whidbey, Hat Island and their affiliates both before and after the transactions) [Section 63.03(b)(1)(ii)]; and/or (b) because the transfer of control of the Whidbey and Hat Island ILECs is being accomplished via the distribution of an estate to surviving family members and/or a family trust rather than via a transfer of stock to an unrelated third party [Section 63.03(b)(1)(iii)].

Applicants also believe this application is appropriate for treatment under Section 63.03(b)(2): (a) because, both before and after completion of the proposed transaction, Whidbey, Hat Island and their affiliates will have a market share in the interstate, interexchange market of substantially less than ten percent (10.0%); (b) because the proposed transactions do not involve the expansion of Whidbey's of Hat Island's existing services or service areas, nor the acquisition of control by Whidbey, Hat Island or their affiliates of any dominant or non-dominant carrier (including any carrier that provides telephone exchange and/or exchange access services within, adjacent to, or outside the service areas of any of the telecommunications carriers presently affiliated with Whidbey and Hat Island); and (c) because the approximately 12,600 access lines served by Whidbey and Hat Island comprise only a very small

fraction of the 3,093,097 end-user switched access lines that constituted two percent (2%) of the nation's estimated 154,654,847 end-user switched access lines as of June 30, 2008.¹

(9) Identification of all other Commission applications related to the same transaction:

Applicants will file an application for the transfer of control of Western's International Section 214 authorization for global resale (File No. ITC-214-20000315-00172).

Whidbey filed applications for transfer of control of the following radio licenses: (a) 700 MHz Lower Band Service Stations WQIZ641, WQIZ642, WQIZ643, WQIZ644, WQIZ645 and WQIZ646; (b) Paging and Radiotelephone Service Stations KNKM256 and KOP303; (c) Broadband Personal Communications Service Stations KNLG248 and KNLG517; (d) Common Carrier Point-to-Point Microwave Service Stations WGX509, WGX510, WLK849, WLK850, WLL520 and WPNC313; (e) Conventional Industrial/Business Pool Service Stations WPKS779 and WPQI277; (f) Marine Coast Service Station WHU300; (g) 700 MHz Lower Band Service Stations WPYU553, WPYU554 and WPYU555; and (h) 220 MHz Service (Non-nationwide) Stations WPCW390 and WPCW391).

(10) Statement of whether the applicants are requesting special consideration because a party to the transaction is facing imminent business failure:

No party to the proposed transactions is believed by applicants to be facing imminent business failure. Therefore, the applicants are not requesting special consideration because a party to the transaction is facing imminent business failure.

(11) Identification of any separately filed waiver requests being sought in conjunction with the transaction:

No separately filed waivers or waiver requests are being sought in conjunction with the proposed transaction.

¹ Source: United States Federal Communications Commission, Industry Analysis and Technology Division, Wireline Competition Bureau, <u>Local Telephone Competition Status as of June 30, 2008</u>, July 2009, Table 1.

(12) Statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets:

The proposed transactions will serve the public interest by ensuring the orderly transfer of the ownership and control of Whidbey, Hat Island and their subsidiaries from the Henny Estate (which acquired the stock upon the death of David C. Henny) to Mrs. Henny and/or the Henny Trust (which is controlled by members of the Henny family). Whidbey and Hat Island both have a solid record of providing quality telecommunications services at affordable rates to the residents and businesses of their Washington service areas. For example, in 1961 Whidbey became the first local telephone company in the United States to complete the burial of 100 percent of its local lines. Under the ownership and control of Mrs. Henny and the Henny Trust, Whidbey and Hat Island will continue to provide its Washington customers with quality local exchange, exchange access and (through Western) interexchange services at affordable rates.

Conclusion

In light of the foregoing facts and public interest considerations, the Commission is respectfully requested to authorize the transfer of control: (a) of the domestic blanket Section 214 authorizations held by Whidbey Telephone Company and its wholly-owned subsidiary Western Long Distance, Inc. from the Estate of David C. Henny to Marion F. Henny and the David Christian Henny Testamentary Trust; and (b) of the domestic blanket Section 214 authorization held by Hat Island Telephone Company from the Estate of David C. Henny to the David Christian Henny Testamentary Trust.

The Estate of David C. Henny, Marion F. Henny and the David Christian Henny Testamentary Trust reiterate that they certify, pursuant to 47 C.F.R. Sections 1.2001 through 1.2003 that no party to the present application is subject to denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

ESTATE OF DAVID C. HENNY	MARION F. HENNY
By Marion 2 Hearry Marion F. Henny Personal Representative Date: Sept. 23,09	Marion F. Henny Date: Sept 23,09
·	DAVID CHRISTIAN HENNY TESTAMENTARY TRUST
	By: Marion 2 Houng Marion F. Henny Trustee
	Date: Sept. 3,3,09
,	By: Morg. 77 Hong George T. F. Henny Trustee
	Date: September 24, 2009
	By: Holder Julia H. DeMartini
	Trustee Date: 44, 2009

EXHIBIT A

MAP OF LOCAL EXCHANGE AREAS
OF
WHIDBEY TELEPHONE COMPANY
AND
HAT ISLAND TELEPHONE COMPANY

First Revision of Sheet No. 300 Cancelling Original Sheet No. 300

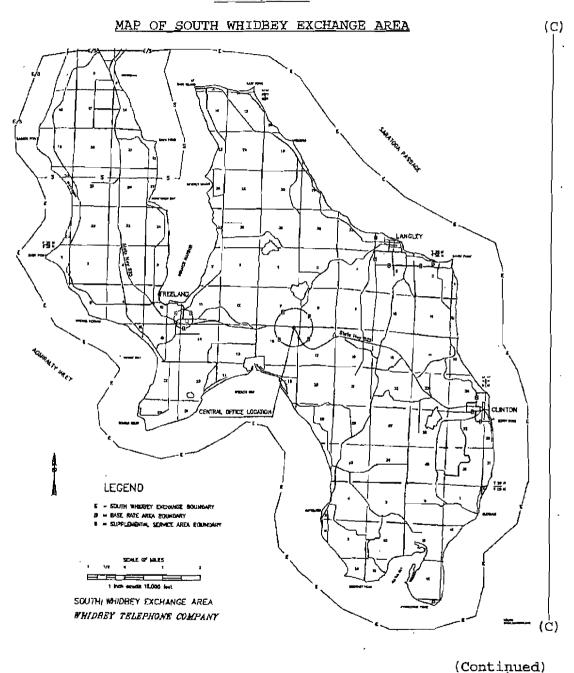
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WHIDBEY TELEPHONE COMPANY

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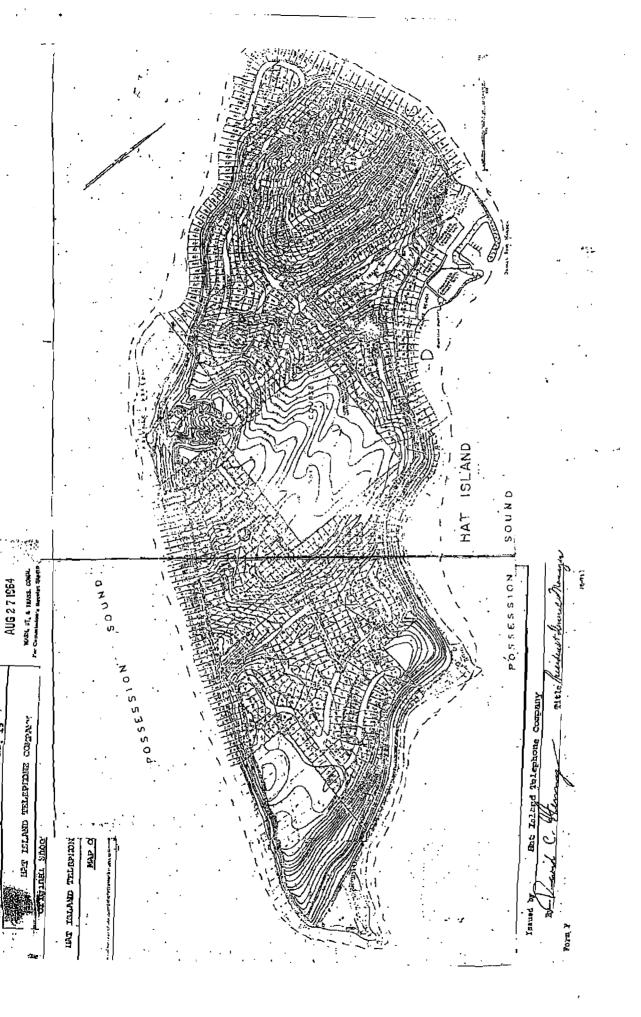
Issued January 10, 1995 Effective February 10, 1995

Issued by Whidbey Telephone, Company

, President

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<u>President</u>



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FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE

Approved by OMB 3060-0589
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14888 SR 525				
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CERTIFICATION STATEMENT				
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the best of my knowledge, information and belief.				
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I hereby authorize the FCC to charge my credit card	for the service(s) authorization here	ein described.		
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